

Andrea J. Ritchie, Esq.
428 Park Pl., 2B
Brooklyn, NY 11238
(646) 831-1243 • andrea.jritchie@aol.com

November 19, 2007

Hon. James C. Francis IV
United States Magistrate Judge
United States District Court for the Southern District of New York
500 Pearl Street, Room 1960
New York, New York 10007-1212

VIA FACSIMILE: (212) 805-7930

Re: *Tikkun v. City of New York, et al.*
05 Civ. 9901 (RJS) (JCF)

Dear Judge Francis:

Plaintiff submits this reply in support of her motion for leave to amend the Complaint in the above-referenced case.

Defendants appear to object to plaintiff's motion to amend in this case in three limited respects: assertion of previously pled state law claims against new defendants, addition of new claims challenging New York City Administrative Code §10-110 and N.Y.P.L §§ 240.20 (5) and (6) as unconstitutional on their face and as applied, and addition of a claim pursuant to 42 U.S.C. § 1983 for denial of the right to a fair trial. Accordingly, defendants should be deemed to have consented to the remainder of plaintiff's proposed amendments to the Complaint in this case.

With respect to the addition of claims asserting facial and as applied constitutional challenges to the City of New York's Parading Without a Permit statute and the disorderly conduct statute, plaintiff in this case relies on the submissions in reply to defendants' opposition made by counsel in *MacNamara v. City of New York, et al.*, 04cv9216, and *Abdell v. City of New York, et al.*, 05cv8453.

With respect to the addition of a claim pursuant to 42 U.S.C. § 1983 for denial of the right to a fair trial, plaintiff relies on the reply of her counsel Rose Weber, Esq. in *Bunim v. City of New York, et al.*, 05cv1562.

Finally, plaintiff seeks to assert only federal claims against newly named defendants, and has done so within the applicable statute of limitations.

Respectfully submitted,

/s
Andrea J. Ritchie (AR 2769)

cc: RNC counsel (by ECF & e-mail distribution list)